

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

CHRISTOPHER META)
Plaintiff,) CASE NO. 4:14-cv-0832
v.) JUDGE DONALD V. NUGENT
TARGET CORP., et al.,)
Defendants.)

FILED

12:15 pm Nov 02 2018

**Clerk U.S. District Court
Northern District of Ohio
Cleveland**

**OBJECTOR ERICH NEUMANN'S
OPPOSITION TO MOTION TO MODIFY APPEAL BOND**

Class Member and Objector Erich Neumann ("Objector") hereby submits this memorandum in opposition to Plaintiff's Motion to Modify Bond to Secure Payment of Costs and Attorneys' Fees on Appeal, ECF No. 197 ("Pl. Mot."). Such a bond is not only unwarranted in this case (and would preclude Neumann's ability to appeal), but is comprised of costs and fees that are not available to Plaintiff under FED. R. APP. P. 7. On these points, Objector respectfully refers the Court to his previous arguments and evidence opposing Plaintiff's previous bond motion. See Neumann Bond Opposition Brief, ECF No. 189; Neumann Affidavit, ECF No. 189-1; and Neumann Motion to Reconsider, ECF No. 190. Plaintiff's Motion should be denied in its entirety.

Alternatively, the undersigned seeks an Order pursuant to FED. R. APP. P. 8 staying imposition of any modified bond order (or amount) as against Neumann.¹

¹ As Plaintiff notes, the undersigned is already subject to a motion to dismiss in the Sixth Circuit for purported failure to pay a bond. Pl. Mot. at 2. This motion has been fully briefed.

DATE: October 31, 2018

Respectfully,



Erich Neumann
Attorney and Objector / Class Member
Erich B. Neumann, P.L.
407 Lincoln Road, Suite 2C
Miami Beach, FL 33139
Phone: (305) 735-2404
Facsimile: (305) 735-2651
ebn@ebnlaw.com

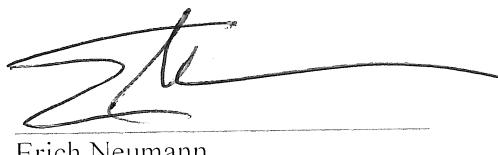
CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was mailed to the following on October 31, 2018:

Clerk of Courts
Carl B. Stokes U.S. Courthouse
801 West Superior Avenue
Cleveland, Ohio 44113

Stuart E. Scott
Spangenberg, Shibley & Liber LLP
1001 Lakeside Avenue East,
Suite 1700
Cleveland, Ohio 44114

Karl A. Bekeny
Tucker Ellis LLP
950 Main Avenue,
Suite 1100
Cleveland, Ohio 44113



The image shows a handwritten signature in black ink, appearing to read "EN". Below the signature is a horizontal line.

Erich Neumann